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**From:** Wu, Jennifer  
**To:** Allen, Elizabeth; Peterson, Erik; Fleming, Sheila; Henning, Alan; Helder, Dirk  
**Sent:** 4/27/2015 4:03:28 PM  
**Subject:** RE: Scientific basis for pesticide-free buffer zones

I hadn't heard about this. That's really unfortunate to say the least.

**From:** Allen, Elizabeth  
**Sent:** Monday, April 27, 2015 12:35 PM  
**To:** Peterson, Erik; Fleming, Sheila; Henning, Alan; Helder, Dirk  
**Cc:** Wu, Jennifer  
**Subject:** RE: Scientific basis for pesticide-free buffer zones

Well, first off, not to worry, once again any effective controls on herbicide spraying in Oregon are going nowhere:

[http://www.oregonlive.com/environment/index.ssf/2015/04/how\\_average\\_oregonians\\_challen.html](http://www.oregonlive.com/environment/index.ssf/2015/04/how_average_oregonians_challen.html)

I think I may have had a conversation with Justin in recent weeks. I also have to wonder what would be the reaction from industry if local residents began apply herbicides harmful to conifers wholly on their own land, but drift during application, or subsequent volatilization and off-target movement killed some seedlings? I'd imagine there'd be much outcry and calls for legislation to halt the practice. And that such legislation would pass quickly. It seems curious to me that we'd allow the opposite to happen – and without buffer zones how can it not? – with almost no data on the revolatilization of many of the herbicides used in forestry, or any empirical data that would allow us to quantitatively assess the exposures of the individuals and communities that coexist with private timber land.

Dirk's description of a worst-case scenario with Roundup tends to mimic the conditions in the coastal mountains of Oregon, and one the residents there have complained about for years. Aside from any issues of whether actual exposures are enough to cause adverse effects – and I have my concerns about the way OPP sets acceptable exposures – it isn't clear to my why this isn't just an issue of the right of private citizens against chemical trespass on their property.

Elizabeth

**From:** Peterson, Erik  
**Sent:** Monday, April 27, 2015 11:02 AM  
**To:** Fleming, Sheila; Allen, Elizabeth; Henning, Alan; Helder, Dirk  
**Cc:** Wu, Jennifer  
**Subject:** RE: Scientific basis for pesticide-free buffer zones

Sheila, Elizabeth, Alan and Dirk,

I am writing with the hope of identifying the appropriate person to follow-up on a question from the Oregon Health Authority.

If you scroll down to the original message from Justin Waltz at OHA, you can see the issue and question.

I don't think there is a short, distinct, single answer to his question, so, I think a good path forward would be to have one of you respond to Justin directly.

Please respond with your interest or availability for contacting Justin Waltz at OHA. I'm sure that a contact from Region 10 would be much appreciated.

Thank you!

Erik Peterson

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**From:** Wu, Jennifer  
**Sent:** Wednesday, April 22, 2015 10:31 AM  
**To:** Peterson, Erik  
**Subject:** RE: Scientific basis for pesticide-free buffer zones

Hi Erik – I'm glad Justin's contacted you on this. Since he's working more on the effects of aerial application for residences instead of nonfish bearing strams that CZARA was focused on, I'd suggest talking with Sheila Fleming and Elizabeth Allen in OEA on this. They were/are involved with the Triangle Lake in addition to Alan, of course. But Elizabeth might have some insight into the toxicology behind this.

Come to think of it, Dirk Helder would be good as well for his information from OPP in EPA HQ since in FIFRA analyses, they consider aerial application impacts on people. I'd think they have some underlying science on this(?).

Let me know if you want more help, and I'd be happy to share the work as it's great to be supportive of Oregon's steps to introduce legislation on pesticide buffers for residences.

**From:** Peterson, Erik  
**Sent:** Tuesday, April 21, 2015 4:13 PM  
**To:** Wu, Jennifer  
**Subject:** FW: Scientific basis for pesticide-free buffer zones

Jenny,

I received the following message from Justin Waltz at Oregon Health Authority. He is involved in putting together information for the Oregon legislature in pesticide buffers for forestry.

Given your experience with CZARA, can you suggest a way to go about getting a response to Justin? For example, what group of people could I share this question with to help formulate a useful response?

I looked through the CZARA rationale and I don't think the answer is in there exactly, although, I think the work surrounding the rationale and response to comments should be valuable.

Thanks for any input on how I might go about helping Justin out.

Erik Peterson  
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**From:** WALTZ Justin [<mailto:justin.waltz@state.or.us>]  
**Sent:** Thursday, April 16, 2015 11:50 AM

**To:** Peterson, Erik  
**Subject:** Scientific basis for pesticide-free buffer zones

Hi Erik –

Again, I really appreciate your time and willingness to help me out.

A discussion with my contacts at EPA's Office of Pesticide Programs reveals that there isn't any research that's been done (or is being done) at EPA on general pesticide-free buffer zones. In other words, any buffer zones required by EPA are specific to certain pesticides. When they are required, they're stated on the label ("the label is the law" ya-da ya-da).

So my specific question, which I'm hoping you can circulate as appropriate, are:

1. Is there any research (either published or on-going) which concludes anything about the minimal distance needed for a pesticide-free buffer zone between a forestry site undergoing aerial pesticide application and an adjacent or nearby residence?

[I'm asking about "general" pesticide-free buffers for residences, not those on the label of certain pesticides , as required by EPA.]

Also, here is a the Recognition and Management of Pesticide Poisoning 6<sup>th</sup> Edition, released January 2013. In particular, I draw your attention to Chapter 21 – Chronic Effects. This is the first-time this topic has been explored in this venerable book for healthcare providers. In my opinion, it's telling of EPA's sense that it's going to uncharted territory such that EPA felt the need to devote a Q&A section on that chronic effects section on the online version of this book (but not the book itself).

Anyway, any further assistance would be much appreciated.

Thanks! - JEDW

**Justin Waltz, MPH**

Program Analyst & Coordinator

PEST Program (Pesticide Exposure Safety & Tracking) & Oregon Radon Program

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